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JUL 13 1999

Mr. Greg deBruler  
CRCIA Team Chair  
P.O. Box 912  
Bingen, Washington 98605



Dear Mr. DeBruler:

**COLUMBIA RIVER COMPREHENSIVE IMPACT ASSESSMENT (CRCIA) AND THE  
GROUNDWATER/VADOSE ZONE (GW/VZ) INTEGRATION PROJECT**

Thank you for your letter of June 11, 1999, on the above subject. Your letter requesting clarification of the Hanford GW/VZ Integration Project's position on the CRCIA Part II Requirements is timely given the recent discussions on this topic in our Monday afternoon project meetings. 51411

The initial commitment DOE made on future use of the CRCIA documents dates back to meetings held with you, other CRCIA team members, and Linda Bauer. Linda committed to use CRCIA as a template for developing a future DOE Hanford capability to conduct impacts assessments. Understanding of this commitment to use CRCIA as a template was discussed in a public meeting in the spring of 1998. To summarize this meeting, DOE said that the GW/VZ project would consider each of the requirements in CRCIA Appendix II (with the exception of Appendix D, which was addressed in separate correspondence to you and the Hanford Advisory Board Environmental Restoration Committee) for potential use on the project.

There are two key elements to the project's approach to using CRCIA requirements as a template. First, the project embraces the CRCIA principles of completeness, dominance, improving fidelity (accuracy and precision) through multiple iterations and uncertainty. Completeness is embodied in the development of candidate sets for each technical element of the assessment. The principle of dominance is being used to as the primary consideration in developing the study set to be used in each iteration of the assessment. The long-range plan developed for the System Assessment Capability (SAC) shows multiple iterations being used with the intention that with each iteration the fidelity of the assessment improves. The project has recognized the importance in including uncertainty in the analyses undertaken. The project position on these principles is documented in Appendix F of the Draft Project Specification issued last December.

Secondly, the project used the CRCIA requirements as a starting point for developing the candidate sets for the SAC. An initial crosswalk between the CRCIA requirements and the SAC requirements can be seen in the document "Comments on Appendix A: Part II - Requirements

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for a Columbia River Comprehensive Impact Assessment (CRCIA: Part II)." The material included is the result of extensive discussions with CRCIA Team members and others during the fall of 1998. This document is available on the GW/VZ web site.

Since then, several follow-on public meetings have been conducted to develop the project Candidate and Study Sets that would address the above commitment. At the February 24, 1999, project meeting which you attended, the project presented criteria for candidate sets for consideration. On April 9, 1999, the project issued a 93-page report, "Candidate and Study Set Criteria and Proposed Scoping Studies." This report is currently available on the GW/VZ web site. One feature of this report are tables which show the relationship between some of the CRCIA and GW/VZ project requirements.

The "Candidate and Study Set Criteria and Proposed Scoping Studies" document is currently being used in the development of the conceptual model for SAC Rev.0. The conceptual model general assessment concepts were the subject of a meeting with stakeholders, Tribal Nation representatives, and regulators on April 29th and again on May 26th. The concepts are being used to guide the development of the conceptual model for the SAC. The conceptual models resulting from these discussions will subsequently serve as the basis for the system design that will be developed this fall.

DOE staff have been participating in workshop meetings and support the results of these working groups. It has appeared to us that for the worst part, CRCIA Team members have also been supportive of the working group meeting results. Implementation of the working group concepts will take place in a phased approach essentially with each iteration of the SAC. The data gaps identified by working groups have been recognized and accepted by DOE. Again, the actual work to resolve these gaps will take time to accomplish. DOE and the contractor project team are making every effort to proceed with the recommendations of these working groups, which have included CRCIA Team members, regulators, tribal representatives, and other stakeholders.

Your letter also requests information on how much has been spent on a sitewide impacts assessment and what has DOE achieved. The Fiscal Year 1999 budget for the GW/VZ project is slightly over \$6.5M of which about \$2M is focused solely on development of the SAC itself. The project accomplishments are stated in the Monday afternoon project meetings and are documented in the meeting notes which are sent to you.

Finally, you ask if the CRCIA Team members and their respective organizations should remain involved in the project. The answer is that most of the CRCIA Team members and their organizations have been involved in the project and we hope that they will continue to participate. The CRCIA Team organizations represent an important sub-set of the community interested in this project. The project believes that their input, as well as input from other project participants, will help build a better product that will be useful to decision makers.

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As a closing remark, I would like to recognize the efforts of the CRCIA Team that produced the CRCIA report. My involvement with the GW/VZ project has given me first-hand experience with the magnitude of the effort that you faced as the CRCIA Team took on their challenge. The GW/VZ project has benefited substantially from the use of CRCIA as a template.

If you should have any questions, please call me at (509) 376-3963.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Holten', with a large, sweeping initial 'R'.

Richard A. Holten, Director  
Restoration Projects

GWP:RAH